

## Remarks

### 35 U.S.C. 103

Claims 20-27, 29-31, 33-40, 42-43 and 45-47 are rejected as being unpatentable over the Applicant's admitted prior art (APA) in view of Mott. Reconsideration is requested.

The Examiner concedes that "APA is silent on the VPN media proxy integrating the functionality of a VPN gateway with the functionality of a media proxy" and asserts that "Mott discloses a VPN media proxy integrating the functionality of a VPN media gateway with the functionality of a media proxy".

The Examiner then concludes that "it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the teachings of APA in the aforementioned manner as taught by Mott in order to provide a proxy service in a VPN gateway as opposed to necessitating the use of a separate device".

Applicant respectfully disagrees with the Examiner's conclusion.

Firstly it is submitted that this conclusion over-simplifies what is being claimed and that even if the teaching of Mott was applied to the Applicant's admitted prior art this would not lead to the claimed communication system.

The claimed communication system does not simply integrate the functionality of a VPN gateway with the functionality of a media proxy. This feature has been extracted out of context from the subject claim. The claimed system is concerned with a particular kind of media proxy and a particular kind of VPN gateway. The same applies to the Examiner's remarks concerning Mott. The Examiner appears to have taken features out of context from Mott as the basis of the obviousness rejection.

Mott teaches no more than that it is possible for a VPN gateway shared by two VPN clients residing on individual user devices to serve as a replacement for a DNS server. If the teaching of Mott was applied to the Applicant's admitted prior art, the result might be that respective VPN clients residing on two of the user devices on one of the VPN sites (e.g. the blue site) would share a VPN gateway acting as DNS server. This bears no relation to what is happening at the point where first and second data networks are interfacing with each other, one of which interconnects several virtual private networks. Thus even if the teaching of Mott was applied to the Applicant's admitted prior art, the result would not be the communications system claimed in claim 20.

Put another way, it does not follow from Mott that it is possible for a VPN gateway shared by a plurality of virtual private networks (not VPN clients), which is not even comparable to the VPN gateway of Mott, to be integrated with the functionality of a media proxy interfacing first and second data networks thereby connecting the second data network to the plurality of VPNs in the first data network.

In response to the arguments previously submitted, the Examiner comments in section 3 and section 4 of the Office Action that "one cannot show non-obviousness by attacking references individually where the rejections are based on combinations of references". On the other hand, a reference can be attacked individually for the purpose of demonstrating that it is not compatible with the reference with which it is supposed to be combined.

The supposed motivation for combining the teaching of the admitted prior art and Mott is explained in section 5 of the Office Action as follows: "the integration of devices/services is suggested by Mott..." and "the scale on which this (i.e. integration) is applied is unrelated to the motivation for such integration".

Mott does not suggest the integration of devices/services in general as suggested at the beginning of paragraph 5 of the Office Action. Nor does it disclose the general possibility of integrating a proxy into a VPN gateway as the Examiner has asserted in paragraph 8 of the Office Action. On the contrary, the teaching of Mott is very specific. The Examiner has pointed out that the term "media proxy" used in the

present claims is broad. The same can be said of “VPN gateway”. These terms are qualified in the claims of the present application and also in Mott. Mott discloses a VPN gateway shared by two VPN clients residing on individual user devices serving as a replacement for a DNS server. To generalize the teaching of Mott to assert that that Mott suggests the integration of any kind of proxy service into any kind of VPN gateway is to infer from Mott far more than Mott actually suggests.

Applicant respectfully disagrees with the Examiner’s assertion in paragraph 4 of the Office Action that “media proxy” is a broad and relative term that is not further narrowed by the applicant. On the contrary the term is further narrowed by the whole of the final paragraph of current claim 20.

At the end of paragraph 5 of the Office Action the Examiner seems to be asserting that it is generally known to be desirable to integrate devices/services. This is not correct and cannot be inferred from Mott. Sometimes integration is desirable and advantageous and sometimes it is not. The Examiner goes on to say “Such integration is known to provide the benefit of reducing necessary configuration of separate devices and therefore reduce the time cost and monetary cost associated with multiple devices”. The Examiner is requested to cite the basis in Mott for this statement. Even if it can be supported this does not translate to the communications system of the present application. The statement “the scale on which this (integration) is applied is unrelated to the motivation for such integration” is plainly not correct since it implies that integration is always desirable and as noted above, sometimes it is and sometimes it is not. Furthermore, scale matters a great deal in communications systems. Scalability is something engineers in this field are constantly striving to achieve and which involves complex technical problems to be solved. The Examiner’s assertion suggests a lack of understanding of telecommunications.

In a communications system of the type presently claimed there are billions of devices, components and services that might in theory be combined but the suggestion that it would be desirable to integrate any or all of them is not correct. If it were that straightforward the whole of the claimed system would be integrated. However there are practical reasons for the separation of the system devices and

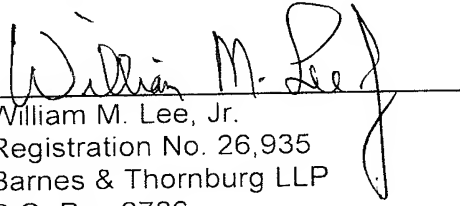
services as described. Faced with such an enormous choice and absent any suggestion as to which should be integrated, the skill of the inventor is in choosing which features to integrate. To choose to integrate particular functions rather than others absent any suggestion to do so cannot be regarded as obvious.

The advantages of the claimed system have been explained in the previous responses and these appear to have received scant attention from the Examiner. These are further indications of the non-obviousness of the claimed system.

Favorable reconsideration of the claims is solicited.

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Respectfully submitted,

  
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